

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules To)	CC Docket No. 94-102
Ensure Compatibility with Enhanced)	
911 Emergency Calling Systems)	
)	
Petition of City of Richardson, Texas)	
)	
)	

**COMMENTS OF
THE CELLULAR TELECOMMUNICATIONS & INTERNET ASSOCIATION**

The Cellular Telecommunications & Internet Association (“CTIA”)¹ hereby submits its comments in support of the petition filed by Sprint Spectrum L.P.d/b/a Sprint PCS (“Sprint PCS”)² for clarification and reconsideration of portions of the *Richardson Order*.³ CTIA agrees with Sprint PCS that to ensure that wireless enhanced 911 (“E-911”) service becomes operational as soon as possible, the Commission should clarify its rules on what constitutes a valid Public Safety Answering Point (“PSAP”) request by which a PSAP triggers a wireless carrier's obligation to provide E-911 service.

¹ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service (“CMRS”) providers and manufacturers, including cellular, broadband PCS, ESMR, as well as providers and manufacturers of wireless data services and products.

² *Sprint PCS Petition for Expedited Clarification and Reconsideration*, CC Docket No. 94-102 (filed Nov. 30, 2001) (“*Sprint PCS Petition*”).

³ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Richardson Order*, (Oct. 17, 2001) (“*Richardson Order*”).

DISCUSSION

Sprint PCS has sought reconsideration and clarification of the Commission's new rules on the process by which a PSAP requests E-911 Phase II services. Consistent with the Commission's goals to "avoid the unnecessary expenditure of carrier and PSAP resources," the Commission should clarify its rules to "help ensure that none of the parties expends resources unnecessarily."⁴ CTIA agrees with Sprint PCS that granting a PSAP request for Phase II service where the PSAP has failed to verify that it will be capable of receiving or utilizing the Phase II data would serve only to frustrate Phase II implementation.

In its petition, Sprint PCS has asked the Commission to clarify that not only must a PSAP document that the necessary CPE upgrades have been implemented, but that Automatic Identification Location ("ALI") database upgrades will be completed within six months of the time of the request.⁵ The Commission has recognized that the failure of a PSAP to complete ALI database upgrades could cause unnecessary delay and without ALI database upgrades a PSAP will not receive operational Phase II service.⁶ CTIA agrees with Sprint PCS that the Commission should adopt the proposed clarification since Phase II service can only become operational when the PSAP's ALI database has also been upgraded to accommodate Phase II service.

⁴ *Richardson Order* at ¶1 and 11.

⁵ *See* Sprint PCS Petition at 5.

⁶ *Richardson Order* at ¶1.

Sprint PCS has also urged the Commission to reconsider its decision regarding the E2 interface standard, or, in the alternative, change the implementation schedule to accommodate for customized installations. In the *Richardson Order*, the Commission rejected the E2 interface standard because it does not want to “dictate technical standards for the implementation of Phase I and II of E911 service.”⁷ While the Commission has recognized that “it is necessary that some common interface standard be employed by the carrier and the PSAP,” it has failed to establish a common interface standard to prevent the chaos that would result from each carrier implementing a different, non-standardized Phase II solution in its network.⁸ CTIA continues to believe that the J-STD-036 standard, which is the standard wireless carriers will be using, is the best solution.⁹ As Sprint PCS explains in its comments, the Commission’s new rules will force carriers to negotiate and install a customized solution since they cannot rely on a standardized solution. CTIA agrees with Sprint PCS that under the new rules, carriers will effectively have less time to install a more complex arrangement.

Finally, CTIA agrees with Sprint PCS that the Commission should confirm that the six-month implementation period is tolled while a PSAP assembles its supporting documentation. Otherwise, carriers will be penalized every time a PSAP fails to respond

⁷ *Richardson Order* at ¶19.

⁸ *Id.*

⁹ Nearly six months ago, CTIA filed comments explaining that a PSAP’s failure to deploy systems in conformity with the J-Std-036 E2 or an equivalent interim solution: 1) increases the potential for incompatible interface standards, further delaying Phase II deployment; 2) blocks the delivery of Phase II data since non-compliant standards generally lack an update request functionality; and 3) fails to include “confidence level” data associated with Phase II location information. *See* CTIA Comments, CC Docket No. 94-102 (filed July 25, 2001) at 4.

to a carrier request for documentation. The Commission should give carriers additional time for installation when a PSAP fails to substantiate Phase II readiness since requiring the premature delivery of Phase II services to a PSAP that will not be capable of utilizing the services would unnecessarily burden carriers and customers with costs for which there are no corresponding benefits. Moreover, requiring wireless carriers to deliver Phase II services when the PSAP will not be capable of utilizing the data within the six-month implementation period is a waste of resources.

CONCLUSION

For the foregoing reasons and as set forth in Sprint PCS's petition for clarification and reconsideration, the Commission should clarify its rules to ensure that a PSAP is ready to use the Phase II location information within six months of the time it makes its request. The wireless industry recognizes the tremendous public safety benefits of wireless 911 service and reaffirms its commitment to deploy Phase II enhanced services.

Respectfully submitted,

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